Job Training Partnership Division



JTPA

Number: D95-29

Serving the People of California

DIRECTIVE

Date: February 1, 1996

69:116:mw

TO: SERVICE DELIVERY AREA ADMINISTRATORS

PRIVATE INDUSTRY COUNCIL CHAIRPERSONS

JTPD PROGRAM OPERATORS

EDD JOB SERVICE OFFICE MANAGERS

JTPD STAFF

SUBJECT: PARTICIPANT MOVEMENT BETWEEN JOB TRAINING PARTNERSHIP

ACT (JTPA) FUNDING SOURCES

EXECUTIVE SUMMARY:

Purpose:

This Directive provides State guidance for transferring participants between various JTPA funding sources, encourages the use of concurrent enrollments and concurrent terminations, and revises policy and procedures pertaining to multiple outcomes for concurrent terminations.

Scope:

The guidance in this Directive applies to participants served in JTPA Title II and Title III programs.

Effective Date:

This Directive is effective on its release date. *Effective April 1, 1995, inter-title transfer terminations for Title II-A (Adults), Title II-A 5 percent Older Individuals, and Title III programs are required to be submitted to the State for Postprogram Follow-Up.*

REFERENCES:

- JTPA Interim Final Regulations, Section 627.455, Section 628.520, Section 628.530
- JTPA Regional Bulletin 25-93, April 1, 1993, Item #107
- Training and Employment Information Notice (TEIN) 5-93, Change 1, June 23, 1994
- TEIN 41-93, March 22, 1994
- TEIN 12-93, September 8, 1993
- JTPA Directive 89-11, Multiple Outcomes for Concurrent Enrollment, December 7, 1989
- JTPA Reporting Manual, Section VI, Worker Adjustment Annual Program Report
- JTPA Reporting Manual, Section VII, JTPA Annual Status Report
- JTPA Reporting Manual, Section VIII, Postprogram Follow-Up

STATE-IMPOSED REQUIREMENTS:

This document contains State-imposed requirements. These requirements are in bold, italic print.

FILING INSTRUCTIONS:

This Directive supersedes JTPA Interim Directive 95-02 and Directive D95-18. This Directive also revises State instruction on Postprogram Follow-Up pertaining to termination codes which are to be submitted for follow-up.

BACKGROUND:

Effective July 1, 1993, the Department of Labor (DOL) instituted revised and consolidated reporting requirements for programs funded under Titles II and III of the JTPA. These requirements were provided via TEIN 5-93 dated July 30, 1993, as the JTPA Standardized Program Information Report (SPIR) reporting instructions. The SPIR instructions were revised and reissued as TEIN 5-93 Change 1, on June 23, 1994.

The revised SPIR instructions and subsequent information from DOL national office staff have changed certain reporting instructions. Therefore, this Directive provides new State guidelines on moving participants between fund sources (both intra- and inter-title transfers). In reviewing SPIR guidelines, three major changes in federal instruction have been made.

- 1. Any termination including a transfer to another title or fund source is final and the outcome is viewed as final.
- 2. All terminations including transfers must be reported for Postprogram Follow-Up.
- 3. The SPIR requires reporting a separate outcome for each fund source in which an individual participates.

This Directive discusses, in detail, the effect of these changes on program performance, Service Delivery Area (SDA) costs, and other program areas.

POLICY AND PROCEDURES:

DEFINITIONS:

I. Transfer

- A. Inter-title transfer means moving a participant between titles or subtitles (fund sources); for example, between Title II and Title III or between Title II-A and Title II-C. When these participants are terminated, the outcomes reported are considered final.
- B. Intra-title transfer means moving a participant among program activities within the same fund source. These participants are not terminated from the fund source.

II. Concurrent Participation

Concurrent participation and co-enrollment means participation in two or more separate titles, subtitles, or fund sources at the same time.

III. Concurrent Termination

Concurrent termination means that the participant is terminated from more than one funding source at the same time.

PROCEDURES:

I. TRANSFERS

The State encourages the use of concurrent enrollments and concurrent terminations for a number of reasons. Because of SPIR instructions and changes in interpretation received from DOL, inter-title transfer terminations will have a negative effect on the program outcomes. Inter-title transfers are still allowed, but SDAs must be aware of the consequences and make decisions with these consequences in mind.

As part of this section we have included several diagrams. The <u>shaded diagrams</u> indicate reporting practices that result in negative outcomes, unnecessary costs, or less desirable results. A General Codes list (Attachment 1) is provided to assist with the interpretation of the Enrollment and Termination Codes that are used in the diagrams. SDAs that are using the Job Training Automation (JTA) system should review the diagrams in conjunction with the General Codes list provided in Attachment 1.

A. Inter-Title Transfers and Effect on Performance

<u>Inter-title transfer termination</u> (transferred to another fund source) results in a final, <u>non-positive outcome</u> for the first fund source. An exception to this rule would be a transfer to non-Title II training which would result in a positive youth enhancement outcome.

When a participant moves from one funding source to another, the SDA may:

- 1. terminate the participant from funding source A and enroll in funding source B; or,
- 2. co-enroll the participant in fund source B without terminating from fund source A, and concurrently terminate from all fund sources when all component activities are completed.

B. Inter-Title Transfers and Effect on Postprogram Follow-Up

As noted above, effective April 1, 1995, inter-title transfer terminations in Title II-A (Adults), Title II-A 5 percent Older Individuals, and Title III programs are required to be submitted to the State for Postprogram Follow-Up because the SPIR required that follow-up data be collected for all terminees, including inter-title transfers, in these titles. Prior to the new DOL and SPIR changes, California chose to exempt inter-title transfers from the Postprogram Follow-Up pool.

As a result of these changes, terminees from inter-title transfers will receive multiple follow-up interviews even though still participating in JTPA under another fund source. On the other hand, concurrently enrolled participants who are concurrently terminated at the end of all program activities will receive one Postprogram Follow-Up interview with results applied to all funding sources.

Inter-Title Transfers: The use of inter-title transfers will require the participant to enter the follow-up pool after terminating from the funding source even though the participant is active in another JTPA funding source.

Title II-A 77% |ÄÄÄÄÄÄÄÄÄÄÄÄÄÄ

Enr Code=1A Term Code=5

Section 204(d)

Enr Code=1B

Term Code=5 Title II-A 77%

|ÄÄÄÄÄÄÄÄÄÄÄÄÄ

Enr Code=1B Term Code=1

Enr Date	Enr Code	Fund Source	1st Trng Date	Term Code	Last Trng Date	Term Date	Follow-Up
1/4/93	1A	20	2/1/93	5	4/15/93	4/15/93	Yes
4/15/93	1B	23	4/15/93	5	7/3/93	7/3/93	Yes
7/3/93	1B	20	7/3/93	1	10/25/93	10/25/93	Yes

Co-Enrollments and Concurrent Terminations: The use of co-enrollments and concurrent terminations will result in the terminee entering the follow-up pool once and with follow-up results applied to both funding sources.

Title II-A 77%

Enr Code=1A

Term Code=1

Section 204(d)

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Enr Code=1D Term Code=1

Enr Date	Enr Code	Fund Source	1st Trng Date	Term Code	Last Trng Date	Term Date	Follow-Up
1/4/93	1A	20	2/1/93	1	10/25/93	10/25/93	Yes
4/15/93	1D	23	4/15/93	1	10/25/93	10/25/93	Yes

Due to the negative impact on performance standards and the additional costs associated with Postprogram Follow-Up, SDAs should not use "transfer to other funding source" termination codes except where necessary.

C. Inter-Title Transfers and Effect on the Summer Youth Employment Training Program (SYETP)

1. Title II-C to Title II-B

The SDAs should not terminate a Title II-C youth who participates in the Title II-B SYETP unless the youth is not expected to return to Title II-C for further employment, training, and services. It is an appropriate option to terminate a participant from Title II-B SYETP as an inter-title transfer since this fund source does not have performance standards associated with it and is not reported on the SPIR.

Inter-Title Transfers: The use of inter-title transfers will result in two SPIR records for Title II-C 82 percent. The two Title II-C 82 percent terminations will be used to calculate performance. Since the inter-title transfer outcome is a non-positive outcome, this will negatively impact performance for the funding source.

Title II-C 82%

Enr Code=1A

Term Code=5 Title II-B SYETP

|AAAAAAAAAAAA| Enr Code=1B Term

Term Code=5 Title II-C 82%

Enr Code=1B Term Code=32

Enr Date 12/15/93	Enr Code 1A	10	1st Trng Date 1/15/94	Term Code 5	Last Trng Date 5/30/94	5/30/94	Follow-Up No
5/30/94	1B	29	5/30/94	5	8/10/94	8/10/94	No
8/10/94	1B	10	8/11/94	32	12/2/94	12/2/94	No

Co-Enrollments With an Inter-Title Transfer Outcome: The use of co-enrollments will result in one SPIR record for Title II-C 82 percent and the results will be used to calculate performance. Since the Title II-B SYETP will not be submitted for SPIR and is not a performance-based funding source, an inter-title transfer outcome is appropriate.

Title II-C 82%

Enr Code=1A

Term Code=32

Title II-B SYETP |ÄÄÄÄÄÄÄÄÄÄÄÄÄÄ

Enr Code=1D

Term Code=5 or a term code that represents the outcome.

Enr Date	Enr Code	Fund Source	1st Trng Date	Term Code	Last Trng Date	Term Date	Follow-Up
12/15/93	1A	10	1/15/94	32	12/2/94	12/2/94	No
5/30/94	1D	29	5/30/94	5	8/10/94	8/10/94	No

II. OBJECTIVE ASSESSMENT ONLY OUTCOMES

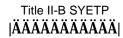
Based on the SPIR instructions and discussions with DOL staff, the State recognizes that a participant may have an outcome of "objective assessment only" in one funding source (for example, Title II-C) and receive a separate training and services outcome in a subsequent fund source (for example, Title II-A/C 8 percent). While objective assessment will usually be the first activity in the initial funding source, there are at least two scenarios where training and services may be the first activity followed by objective assessment. These examples are detailed in Section B below.

A. Objective Assessment Outcome and Effect on Performance Standards

- 1. Under the amended JTPA, participants who receive "objective assessment only" <u>under Title II funded programs</u> are excluded from performance standards.
- "Objective assessment only" is not a valid program outcome under Title III and any participants terminated as such are <u>included</u> in Title III performance standards.

B. Full Objective Assessment Versus Modified Assessment

While Title II-B SYETP and Title II-A/C 8 percent Greater Avenues for Independence (GAIN) programs require objective assessment, this assessment is of a "modified" variety and is not required to determine the suitability of training and/or services in any subsequent JTPA fund source. It is appropriate for a participant who has received a modified assessment followed by services or training in Title II-B SYETP or Title II-A/C 8 percent GAIN program to subsequently be enrolled in objective assessment in another fund source (such as Title II-C). If the objective assessment determines that no further JTPA training or services are necessary, the participant may be terminated as objective assessment only.



Enr Code=1A Term Code=5 or a code that represents the outcome Title II-C 82%

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Enr Code=1E Term Code=26

Enr Date	Enr Code	Fund Source	1st Trng Date	Term Code	Last Trng Date	Term Date	Follow-Up
5/10/94	1A	29	6/1/94	5	8/30/94	8/30/94	No
8/30/94	1E	10	None	26	None	10/1/94	No

C. Scenarios for Taking an Objective Assessment Only Outcome

The following describes various scenarios for taking an "objective assessment only" outcome when moving a participant between funding sources.

 The participant's first activity is Title II-B SYETP. The participant receives a modified assessment in Title II-B SYETP. The participant is then inter-title transferred to Title II-C 82 percent where he/she receives a full objective assessment. At this time it is determined that continuance in JTPA is not appropriate. The participant may be terminated from Title II-C 82 percent as objective assessment only.

Title II-B SYETP |ÄÄÄÄÄÄÄÄÄÄÄÄÄ

Enr Code=1A

Term Code=5

Title II-C 82%

Enr Code=1E

Term Code=26

Enr Date Enr Code Fund Source 1st Trng Date Term Code Last Trng Date Term Date Follow-Up 5/15/94 1A 29 5/15/94 5 9/30/94 9/30/94 Nο 9/30/94 1E 10 None 26 None 10/3/94 No

• The participant's first activity is Title II-C 82 percent. The participant receives a <u>full</u> objective assessment where it is determined that a training program funded under Title II-A/C 8 percent is the most appropriate activity for the participant. The participant may be terminated from Title II-C 82 percent as objective assessment only and be enrolled in Title II-A/C 8 percent for training.

Title II-C 82%

Enr Code=1E

Term Code=26

Title II-A/C 8% |ÄÄÄÄÄÄÄÄÄÄÄÄÄÄ

Enr Code=1B Term Code=17

Term Code Last Trng Date Term Date Follow-Up Enr Date Enr Code Fund Source 1st Trng Date 3/1/94 1E 10 None 26 None 6/15/94 No 6/15/94 1B 28 6/15/94 17 11/15/94 11/15/94 No

• The participant's first activity is Title II-A 77 percent. The participant receives a <u>full</u> objective assessment where it is determined that a training program funded under Title II-A 5 percent Incentive is the most appropriate activity for the participant. The participant may be terminated from Title II-A 77 percent as objective assessment only and enrolled in Title II-A 5 percent Incentive for training.

Title II-A 77%

Enr Code=1E

Term Code=26

Title II-A 5% |ÄÄÄÄÄÄÄÄÄÄÄÄÄÄ

Enr Code=1B Term Code=1

Enr Date	Enr Code	Fund Source	1st Trng Date	Term Code	Last Trng Date	Term Date	Follow-Up
2/1/94	1E	20	None	26	None	4/15/94	No
4/15/94	1B	26	4/15/94	1	9/15/94	9/15/94	Yes

• The participant's first activity is Title II-A 77 percent. The participant receives a <u>full</u> objective assessment where it is determined that a training program funded under Title II-A 5 percent Incentive is the most appropriate activity for the participant. A few months later it is determined that the participant needs additional training. The most appropriate training program is funded by Title II-A 77 percent. The participant may terminate from Title II-A 77 percent as objective assessment only and enroll in Title II-A 5 percent and subsequently re-enroll in Title II-A 77 percent for training.

Title II-A 77% |ÄÄÄÄÄÄÄÄÄÄÄÄÄÄ

Enr Code=1E

Term Code=26

Title II-A 5% |ÄÄÄÄÄÄÄÄÄÄÄÄÄÄ

Enr Code=1B

Term Code=7 Title II-A 77%

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Enr Code=1B Term Code=1

Enr Date	Enr Code	Fund Source	1st Trng Date	Term Code	Last Trng Date	Term Date	Follow-Up
2/1/94	1E	20	None	26	None	4/15/94	No
4/15/94	1B	26	4/15/94	7	9/15/94	9/15/94	Yes
9/15/94	1B	20	9/15/94	1	11/15/94	11/15/94	Yes

• The participant's first activity is Title II-C 5 percent Incentive. The participant receives a <u>full</u> objective assessment and is enrolled into training in a special at-risk youth program. The participant completes the course and is terminated from Title II-C 5 percent Incentive and enrolled into another assessment component funded by Title II-C 82 percent. The assessment determines that further JTPA activity is unwarranted. The SDA <u>may not</u> take an objective assessment only termination out of Title II-C 82 percent since the individual already received a full assessment under another Title II funding source.

Title II-C 5%

Enr Code=1A

Term Code=7

Title II-C 82%

Enr Code=1B

Term Code=25 or an appropriate code (Do not use Term Code =26)

Enr Date	Enr Code	Fund Source	1st Trng Date	Term Code	Last Trng Date	Term Date	Follow-Up
3/1/94	1A	16	6/1/94	7	11/15/94	11/15/94	No
11/15/94	1B	10	11/16/94	25	1/11/95	1/11/95	No

Intra-Title Transfer: The intra-title record will show the assessment period.

Title II-C 5%

Enr Code=1A

Term Code=4

Title II-C 5%

Term Code=7 Title II-C 82%

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Enr Code=1B

Term Code=25 or an appropriate code (Do not use Term Code=26)

Enr Date	Enr Code	Fund Source	1st Trng Date	Term Code	Last Trng Date	Term Date	Follow-Up
12/1/93	1A	16	None	4	None	1/30/94	No
1/30/94	1C	16	1/30/94	7	7/11/94	7/11/94	No
7/11/94	1B	10	7/11/94	25	1/11/95	1/11/95	No

• The participant's first activity is Title II-C 82 percent. The participant received a <u>full</u> objective assessment and then enrolled in a training program funded under the Title II-C 82 percent program. Upon turning 22 years old, it is determined that a participant can benefit from coenrollment in another training program in Title II-A 77 percent. The participant may be terminated with an intra-title transfer outcome and then enroll in another activity in Title II-C 82 percent. The intra-title transfer outcome will show the assessment period.

Title II-C 82%

Enr Code=1A

Term Code=4

Title II-C 82%

Enr Code=1C

Term Code=7

Title II-A 77%

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Enr Code=1D

Term Code=7

Enr Date	Enr Code	Fund Source	1st Trng Date	Term Code	Last Trng Date	Term Date	Follow-Up
12/1/93	1A	10	None	4	None	1/30/94	No
1/30/94	1C	10	1/30/94	7	1/11/95	1/11/95	No
3/1/94	1D	20	3/1/94	7	1/11/95	1/11/95	Yes

The participant's first activity is Title II-C 5 percent Incentive. The participant receives a <u>full</u> objective assessment where it is determined that a training program funded under Title II-C 82 percent and Title II-A/C 8 percent is the most appropriate. The participant may terminate from Title II-C 5 percent Incentive as objective assessment only and either inter-title transfer or co-enroll and concurrently terminate from Title II-C 82 percent and Title II-A/C 8 percent.

Inter-Title Transfer: The inter-title transfer outcome in Title II-C 82 percent will negatively impact performance.

Title II-C 5%

Enr Code=1E

Term Code=26

Title II-C 82%

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Enr Code=1B

Term Code=5 Title II-C 8%

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Enr Code=1B Term Code=7

Enr Date	Enr Code	Fund Source	1st Trng Date	Term Code	Last Trng Date	Term Date	Follow-Up
12/1/93	1E	16	None	26	None	1/30/94	No
1/30/94	1B	10	1/30/94	5	3/15/94	3/15/94	No
3/15/94	1B	28	3/16/94	7	1/11/95	1/11/95	No

Co-enrollment and Concurrent Termination: The use of concurrent terminations for Title II-C 82 percent and Title II-A/C 8 percent will allow the participant to claim the positive outcome in both fund sources.

Title II-C 5%

Enr Code=1E Term Code=26

Title II-C 82%

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Enr Code=1B

Term Code=7

Title II-A/C 8%

Enr Code=1D Term Code=7

Enr Date	Enr Code	Fund Source	1st Trng Date	Term Code	Last Trng Date	Term Date	Follow-Up
12/1/93	1E	16	None	26	None	1/30/94	No
1/30/94	1B	10	1/30/94	7	1/11/95	1/11/95	No
1/30/94	1D	28	1/30/94	7	1/11/95	1/11/95	No

• The participant's first activity is Title III formula. The participant receives a full objective assessment where it is determined that continuance in JTPA is not appropriate. Since objective assessment is not a valid Title III activity, the participant must be terminated as having received basic readjustment services only. Individuals who receive basic readjustment services under Title III are included in performance standards calculations and are non-positive terminations. The SDA should consider a limited assessment for Title III targeted individuals prior to enrollment as a participant.

III. CONCURRENT PARTICIPATION AND MULTIPLE OUTCOMES

A. Rules of Concurrency

1. Must Be Documented in Individual Service Strategy (ISS)

A participant who is concurrently enrolled must have an initially determined training objective that will require concurrent participation in more than one program/title, including non-JTPA programs. Concurrent participation in more than one program/title will not be allowed if the participant's ISS documents that only multiple activities in a single program or title are required.

2. Apply Final Program Outcome to All Funding Sources

The type of termination determined for the final fund source must be recorded for all previous fund sources for these participants who concurrently terminate. While SDAs may take positive outcomes in each program, they must keep in mind that where the final program outcome is negative (or non-positive) that outcome must be recorded for all fund sources as well.

3. Concurrent Participation and the 90-Day Clock

While a participant is concurrently enrolled and receiving any services or (re)training under another funding source, any period of inactivity in a given program (Title II and/or Title III) shall not be counted as part of the single period of up to 90 days of inactive status. After completion of the services or (re)training activity, the clock for the single period of up to 90 days of inactive status starts or resumes. While a participant is concurrently participating in more than one funding source (Title II and/or Title III), the participant only has to be active in ONE of the funding sources to be considered active in the JTPA program. The 90-day clock does not start or resume until the participant has completed all program activities.

4. Concurrent Outcomes Result From Concurrent Termination

Multiple outcomes as a result of concurrent enrollment or participation can only be taken if the participant terminates from <u>all programs</u> simultaneously. A multiple outcome cannot be claimed if the participant is concurrently enrolled in several programs, but completes one program before completing the other(s). This situation would be considered a transfer.

B. Concurrent Termination and Postprogram Follow-Up

If a participant who concurrently terminated from all funding sources has been selected in more than one follow-up sample, the responses collected from a single interview may be shared among the different titles/programs to avoid the necessity of multiple interviews with the same individual.

When an individual who has terminated from one title/program and subsequently become a participant in another program, (i.e., not a concurrent participant) and is selected in the sample for both titles/programs, separate interviews must be conducted. Further, if an individual is selected in one sample and is a participant in another title/program at the time of the interview, regular follow-up information should be determined and recorded.

C. Concurrent Termination and Outcomes for Funding Sources With Different Eligibility Criteria

1. Title II-C and Title II-A

An individual who is enrolled in the Title II-C Youth program may, upon turning 22 years old, be <u>co-enrolled</u> into the Title II-A Adult program and be concurrently terminated from all programs.

The participant must be age eligible at the time of co-enrollment into the Title II-A Adult program but does not otherwise have to be recertified for the Title II-A Adult program EVEN if the individual was originally deemed eligible only for Title II-C on the basis of being eligible for a non-JTPA program, e.g., free meals under the National School Lunch Act, etc. However, if such an individual is <u>terminated</u> from Title II-C, she/he then

must meet the regular Title II-A eligibility requirements and be so certified, prior to Title II-A participation.

Under the rules of concurrent participation, a participant who is co-enrolled in Title II-C and Title II-A only has to be active in one of the two funding sources and is free to move back and forth between Title II-C and Title II-A funded activities until such time that the training cycle is complete and the participant is concurrently terminated from the JTPA program.

Inter-Title Transfers: The use of inter-title transfers will result in a negative outcome for Title II-C 82 percent that will affect performance standards.

Title II-C 82% |ÄÄÄÄÄÄÄÄÄÄÄÄ

Enr Code=1A Term Code=5

Title II-A 77%

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Enr Code=1B

Term Code=1

Enr Date	Enr Code	Fund Source	1st Trng Date	Term Code	Last Trng Date	Term Date	Follow-Up
2/1/94	1A	10	3/1/94	5	6/15/94	6/15/94	No
6/15/94	1B	20	6/15/94	1	11/15/94	11/15/94	Yes

Co-enrollments and Concurrent Terminations: Age at participation is used to determine which JTPA program the participant can enroll in. The use of co-enrollments will eliminate the need to recertify the participant and the terminee may have an outcome that may positively impact performance.

Title II-C 82%

Enr Code=1A

Term Code=1

Title II-A 77%

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Enr Code=1D

Term Code=1

Enr Date	Enr Code	Fund Source	1st Trng Date	Term Code	Last Trng Date	Term Date	Follow-Up
2/1/94	1A	10	3/15/94	1	11/15/94	11/15/94	No
6/15/94	1D	20	6/15/94	1	11/15/94	11/15/94	Yes

2. Title II and Title III

Participants who are concurrently enrolled in both Title II and Title III programs must have been certified as eligible in both titles.

Please use the following guidelines when the participant is concurrently terminating from both Title II and Title III programs.

If the Title III termination code is:	The Title II termination code can be:		
Transferred to other training	Entered non-Title II training		
programs (Title III only)	or		
	Other Terminations-Voluntary		
	or		
	Other Terminations-Involuntary		
Called Back/remained with layoff	Completed major level of education		
employer (Title III only)	or		
	Attained employability enhancements		
	or		
	Other		

Title II-A 77% Enr Code=1A Term Code=9 Title III 60% |ÄÄÄÄÄÄÄÄÄÄÄÄÄÄÄÄÄÄÄÄÄÄÄÄÄÄÄÄÄÄÄÄ Enr Code=1D Term Code=36 Enr Date Enr Code Fund Source 1st Trng Date Term Code Last Trng Date Term Date Follow-Up 1/15/94 20 3/15/94 11/15/94 11/15/94 1A Yes 5/30/94 60 5/30/94 36 11/15/94 1D 11/15/94 Yes

D. Concurrent Participation and the SYETP Program

Youth who receive concurrent employment, training and/or services under both Titles II-C and II-B are considered participants in both titles for purposes of recording actual number of weeks participated, dollars expended, and other pertinent data. If, however, these youth do not receive Title II-C employment, training and/or services while participating in Title II-B, this period is not to be included in the calculation of the actual number of weeks participated in Title II-C.

ACTION:

It is the SDA's responsibility to establish, maintain, and exercise ongoing controls to assure compliance with these requirements.

INQUIRIES:

Please direct questions about this Directive to your Program Manager of the Program Management Section.

/S/ VICKI J. JOHNSRUD Acting Chief

Attachment

GENERAL CODES

ENROLLMENT CODES

- 1A = New Enrollment
- 1B = Transfer from Another Funding Source
- 1C = Transfer Within Same Funding Source
- 1D = Concurrent Enrollment
- 1E = Assessment Only

TERMINATION CODES

- 1, = Entered Unsubsidized Employment
- 4 = Transfer Within Funding Source
- 5 = Transfer to Another Funding Source
- 7, 9, 32 = Employability Enhancements
- 17, 25, = Non-Positive Terminations
- 26 = Assessment Only
- 36 = Title III Terminations Only (EDWAA)